

REMARKS

The Office Action has been reviewed and carefully considered. No claims were amended in this Response. Thus, claims 1-20 are currently pending. In view of the following remarks, reconsideration and allowance of all of the claims pending in the application are respectfully requested.¹

I. REJECTIONS UNDER 35 U.S.C. § 103 ARE IMPROPER

Claims 1-20 currently stand rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over U.S. Patent No. 6,453,353 to Win *et al.* (“Win”) in view of U.S. Patent No. 7,231,433 to Hellbusch *et al.* (“Hellbusch”).

Independent claim 1 recites a method for integrating security and user account data in a reporting system with at least one remote repository comprising “enabling a user to submit user credential input to a reporting system, wherein the reporting system comprises an On-Line Analytical Processing (OLAP) decision support system (DSS),” “identifying an authentication process from a plurality of authentication processes comprising a standard-mode authentication, pass-through authentication, and anonymous authentication,” and “enabling the first server to apply the authentication process to authenticate the user against a remote repository using Open Database Connectivity (ODBC).” Applicants respectfully submit that none of the cited references, alone or in combination, disclose at least these limitations.

A. *Win and Hellbusch fail to disclose all the claim limitations*

The Office Action alleges that Win teaches “identifying an authentication process from a plurality of authentication processes comprising a standard-mode authentication, pass-through

¹ As Applicants’ remarks with respect to the Examiner’s rejections are sufficient to overcome these rejections, Applicants’ silence as to assertions by the Examiner in the Office Action or certain requirements that may be applicable to such rejections (e.g., whether a reference constitutes prior art, whether it is permissible to combine certain references, assertions as to dependent claims) is not a concession by Applicant that such assertions are accurate or such requirements have been met, and Applicants reserve the right to analyze and dispute such in the future.

authentication, and anonymous authentication,” and “enabling the first server to apply the authentication process to authenticate the user against a remote repository using Open Database Connectivity (ODBC).” However, Applicant respectfully disagrees.

Nothing in Win teaches or even suggests these features. The Office Action cites various portions of Win and alleges that Win uses a standard-mode authentication, pass-through authentication, and anonymous authentication simply because Win uses an authentication process. Authenticating and permitting a user to access certain sources, as allegedly taught by Win, is not the same as identifying an authentication process from a plurality of authentication processes comprising a standard-mode authentication, pass-through authentication, and anonymous authentication. In fact, Win does not even describe any type of “pass-through authentication” or “anonymous authentication.”

The Office Action also alleges that Win’s “Register Repository” is the same as the claimed remote repository using Open Database Connectivity (ODBC). However, Applicant respectfully disagree. Open Database Connectivity (ODBC), as described in the Specification, is a specific method of communicating with databases or database servers and Win simply does not teach or even suggest such communication in its system.

Win purports to disclose a network using role-based navigation among protected information resources (col. 1, lines 11-15). More specifically, Win appears to discuss a method and apparatus for controlling access to protected information resources by enabling organizations to register information sources and user information in a central repository (col. 5, lines 12-14). Win purports to allow administrators to implement access rules by defining roles that users play when working for an organization or doing business with an enterprise, thus forming an additive data model (col. 5, lines 21-23, 57-58). Nothing in Win teaches any type of On-Line Analytical

Processing (OLAP) decision support system (DSS), a plurality of authentication processes comprising a standard-mode authentication, pass-through authentication, and anonymous authentication, and applying the authentication process to authenticate the user against a remote repository using Open Database Connectivity (ODBC), as claimed. These features are simply not disclosed or even contemplated by Win.

In fact, the Office Action acknowledges that Win is at least partially deficient and relies on Hellbusch for teaching an On-Line Analytical Processing (OLAP) decision support system (DSS). *See* Office Action at p. 4. However, Hellbusch does not remedy all the deficiencies of Win. Hellbusch still fails to teach a plurality of authentication processes comprising a standard-mode authentication, pass-through authentication, and anonymous authentication, or applying the authentication process to authenticate the user against a remote repository using Open Database Connectivity (ODBC).

B. There is no rationale of obviousness to combine Hellbusch with Win

Although Hellbusch mentions the use of an on-line analytical processing (OLAP) system, the Office Action fails to provide a proper rationale of obviousness. Thus, even assuming, for the sake of argument, that Hellbusch cure the deficiencies of Win, which Applicant does not so concede, the Office still does not present a proper rationale to combine the references to achieve the claimed system and method, and thus has failed to set forth a *prima facie* case of obviousness. Specifically, modifying the primary reference to include the features of the secondary references would not have been obvious because the modification would represent classic impermissible hindsight.

While it is understood that any judgment on obviousness is in a sense necessarily a reconstruction based on hindsight reasoning, when knowledge is gleaned from Applicant's

specification to arrive at the combination of the primary reference and the secondary reference, which is what the Office has done, such hindsight reasoning is *improper*. One of ordinary skill in the art at the time would not have combined the references to arrive at the purported combination alleged by the Office Action. Merely restating the features taught in each reference is not a proper statement of obviousness. For example, the Office Action fails to explain *why* the art as a whole would suggest use of a Hellbusch's system with Win's system, and if so, *how* that would work.

C. Win teaches away from a combination with Hellbusch

Win makes no suggestion that it would benefit from the teachings of Hellbusch. In fact, the Office Action does not even assert as such. Nothing in any of the reference is cited to support the Office's position of obviousness. Rather, the Office simply restates the key features of Hellbusch's "federated system" and simply alleges that Win would benefit by becoming more like Hellbusch's. However, Applicant respectfully points out that Hellbusch's federated system is directed to a providing an interconnected architecture for *multiple* businesses and enterprises. This is directly contrary to the goal and purpose of Win, which is directed to "internal Web networks that are available to employees of *an* organization" (emphasis added). *See, e.g.*, Win, column 1, lines 44-55. In other words, Win is set on providing an environment where information is protected using its role-based navigation system and method for only *one* business, and therefore clearly teaches away from Hellbusch's federated system, which is directed for *multiple* business. Thus, to combine Hellbusch's system with that of Win's would ultimately render Win's system entirely unsatisfactory for its intended purpose or change the principle of operation.

As a result, the Office fails to present a prima facie case of obviousness and the obviousness rejection for claim 1 is improper and must be withdrawn.

For a proper rejection under 35 U.S.C. § 103(a), each and every claim limitation must be taught or rendered obvious by the combination of references. The outstanding rejection fails to meet this requirement. Thus, the rejection is unsupported and should be withdrawn and allowance of the claim is respectfully requested.

Independent claims 8 and 15, as amended, recite similar limitations to that of independent claim 1, as amended. Therefore, independent claims 8 and 15 are allowable for similar reasons discussed above with respect to independent claim 1.

Dependent claims 2-7, 9-14 and 16-20 depend from independent claims 1, 8, and 15, respectively. Thus, since independent claims 1, 8, and 15 are allowable as discussed above, claims 2-7, 9-14 and 16-20 are also allowable at least by virtue of their dependency on independent claims 1, 8, and 15, respectively. For the reasons stated above, Win and Lai fail to disclose the claimed invention and therefore the rejections should be withdrawn and allowance of these claim is also respectfully requested.

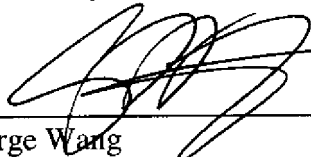
CONCLUSION

It is respectfully submitted that this application and all pending claims are in condition for allowance and such disposition is earnestly solicited. If the Examiner believes that prosecution and allowance of the application will be expedited through an interview, whether personal or telephonic, the Examiner is invited to telephone the undersigned with any suggestions leading to the favorable disposition of the application.

The Director is hereby authorized to treat any current or future reply, requiring a petition for an extension of time for its timely submission as incorporating a petition for extension of time for the appropriate length of time. Applicants also authorize the Director to credit and differences or overpayment of fees to the undersigned's Deposit Account No. 50-0206.

Date: 2/14/11

Respectfully submitted,



George Wang
Registration No. 58,637

For: Brian M. Buroker
Registration No. 39,125

Hunton & Williams LLP
1900 K Street, NW
Washington, D.C. 20006-1109
(202) 955-1500 (phone)
(202) 778-2201 (facsimile)